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Attorneys for Plaintiff Project Sentinel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

PROJECT SENTINEL, individually
and on behalf of the GENERAL
PUBLIC,

Plaintiff,

vs.

RUTH BRIONES, et al.,

Defendants.

VICTOR NEWMAN, individually and
on behalf of the GENERAL PUBLIC,

Plaintiff,

vs.

RUTH BRIONES, et al.,

Defendants.

Lead Case No. C-04-03792 MJJ

Consolidated with:

Case No. C-04-03793 MJJ

JOINT APPLICATION AND
STIPULATION TO MODIFY
PROTECTIVE ORDER; ~~PROPOSED~~
ORDER

On July 6, 2005, Magistrate Judge Bernard Zimmerman issued an order granting in part plaintiff Project Sentinel's motion to compel net worth discovery. Magistrate Judge Zimmerman's order compelling further discovery directed the disclosure of that net worth information pursuant to an "appropriate protective order."

This joint application and stipulation seeks to modify the protective order already issued in this case by designating defendants' net worth information as confidential.

JOINT APPLICATION AND STIPULATION TO MODIFY PROTECTIVE ORDER); ~~PROPOSED~~ ORDER
- LEAD CASE NO. C-04-03792 MJJ


1 A modified protective order, approved by the parties, is attached hereto.

2 So stipulated.

3 Respectfully submitted,

4 BRANCART & BRANCART

5 Dated: ^{Aug 4} July __, 2005

6 
7 Liza Cristol-Deman
8 Attorney for Plaintiff Project Sentinel

9 COLE & FASANO

10
11 Dated: July __, 2005

12 *See attached*
13 Rufus L. Cole
14 Attorney for Plaintiff Victor Newman

15 MCNAMARA, DODGE, NEY, BEATTY,
16 SLATTERY & PFALZER LLP

17 Dated: July __, 2005

18 *see attached*
19 Noah G. Blechman
20 Attorney for All Defendants

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8 Attorney for Plaintiff Project Sentinel

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10 Dated: ^{Aug} July 3, 2005

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13 Attorney for Plaintiff Victor Newman

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18 Noah G. Blechman
19 Attorney for All Defendants

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JOINT APPLICATION AND STIPULATION TO MODIFY PROTECTIVE ORDER) - ~~PROPOSED~~ ORDER
- LEAD CASE NO. C-04-03792 MJJ

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13 Rufus L. Cole
14 Attorney for Plaintiff Victor Newman

15 MCNAMARA, DODGE, NEY, BEATTY,
16 SLATTERY & PFALZER LLP

17 Dated: ^{August} July 4, 2005

18 Noah G. Blechman
19 Attorney for All Defendants

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MODIFIED PROTECTIVE ORDER

IT IS HEREBY ORDERED THAT:

1. The Protective Order issued by the Court on January 28, 2005 is hereby modified to designate the following information as "Confidential Information":

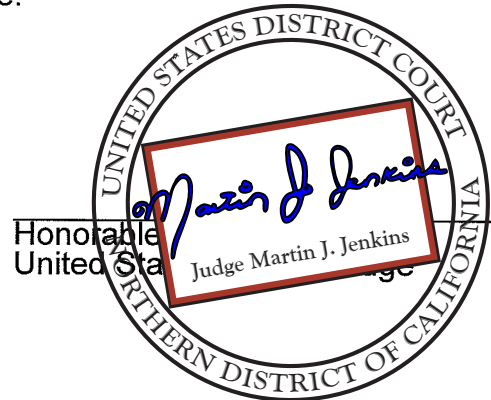
(a) Defendants' net worth.

2. The Confidential Information described above is properly subject to protection under Rule 26(c) of the Federal Rules of Civil Procedure and Magistrate Judge Bernard Zimmerman's order compelling further discovery, dated July 6, 2005.

3. All other terms and provisions of the Court's previously issued Protective Order apply to this Confidential Information. However, the net worth information protected under the terms of this modification shall be for attorneys' eyes only. Such confidential net worth information shall not be disclosed or communicated to anyone, orally or in writing, other than counsel for plaintiffs, and shall not be disclosed to plaintiffs themselves or third-parties at any time.

IT IS SO ORDERED.

DATED: 8/10, 2005.



ATTACHMENT 1

NON-DISCLOSURE AGREEMENT

I, _____, do solemnly swear that I am fully familiar with the terms of the stipulated protective order entered in Project Sentinel and Victor Newman v. Ruth Briones et al., United States District Court, Northern District of California, Lead Case Number C-04-3792 MJJ, and hereby agree to comply with and be bound by the terms and conditions of this order unless and until modified by further order of this Court. I hereby consent to the jurisdiction of this Court for the purpose of enforcing this order.

Dated: _____.

Signature